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March 24, 2011

RECEIVED

MAR 25 2011

PUBLIC SERVICE COMMISSION

VIA FEDERAL EXPRESS

MR JEFF DEROUEN EXECUTIVE DIRECTOR KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD. FRANKFORT KY 40602

Re: In the Matter of: Application of Big Rivers Electric Corporation for

A General Adjustment in Rates

Case No. 2011-00036

Dear Mr. Derouen:

Please find enclosed an original and ten (10) copies of Jackson Purchase Energy Corporation's Motion to Intervene in the above referenced matter.

If you should need anything further, please do not hesitate to contact me at the number listed above.

Sincerely,

myates@dklaw.com

Enclosures

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION RECEIVED

IN THE MATTER OF:

MAR **25** 2011

PUBLIC SERVICE COMMISSION CASE NO. 2011-00036

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL)
ADJUSTMENT IN RATES)

MOTION TO INTERVENE OF JACKSON PURCHASE ENERGY CORPORATION

Now comes Jackson Purchase Energy Corporation ("JPEC") and moves that it be granted full intervention herein. In support of this motion, JPEC state as follows:

- 1. JPEC's address is 2900 Irvin Cobb Drive, Paducah, Kentucky 42002. JPEC's mailing address is P.O. Box 3188, Paducah, Kentucky 42002-3188.
- 2. JPEC is a distribution cooperative and a member of Big Rivers Electric Corporation ("Big Rivers"), the applicant in this proceeding. As a member of Big Rivers, JPEC has an interest in this proceeding because it will be directly impacted by the Commission's rulings and orders herein. The outcome of this case will affect JPEC's members, tariffs and relationship with Big Rivers.
- 3. JPEC should be permitted to intervene because its interest is not otherwise adequately represented by any other party. Further, JPEC's intervention will likely present issues or develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings and without prejudice to any other party.

WHEREFORE, JPEC moves to be granted full intervention and it be afforded any and all relief to which it may appear entitled.

Respectfully Submitted,

Denton & Keuler, LLP PO Box 929 Paducah KY 42002-0929

Phone: (270) 442-8253 Fax: (270) 442-8542

y: 1 / lelisca D. Vate

I hereby certify that the foregoing has been served by mailing a true and correct copy to:

MR JEFF DEROUEN KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD FRANKFORT KY 40602 Via Federal Express

DENNIS G. HOWARD, 11, ESQ. LAWRENCE W. COOK, ESQ. ASSISTANT ATTORNEYS GENER.AL 1024 CAPITAL CENTER DRIVE, SUITE 200 FRANKFORT, KY 40601 -8204

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HON JAMES M MILLER HON MARK WILLIS 100 ST ANN STREET P O BOX 727 OWENSBORO KY 42302-0727 HON J CHRISTOPHER HOPGOOD DORSEY KING GRAY NORMENT & HOPGOOD 318 SECOND STREET HENDERSON KY 42420

on this 24 day of March, 2011

Melissa D. Yates ¿

134373